

MEMO ENDORSED

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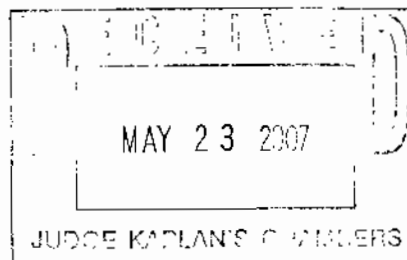
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May 22, 2007

VIA HAND DELIVERY

Honorable Lewis A. Kaplan  
United States District Judge  
United States District Court  
for the Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007



Re: *John Hancock Life Insurance Co., et al. v. Bank of America Corp., et al.*,  
Case No. 07-CV-03790 (In re Parmalat Secs. Litigation, 04-MD-1653 (LAK))

Dear Judge Kaplan:

We represent plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and John Hancock Insurance Company of Vermont (together, "Hancock") in the above-referenced matter. On January 7, 2007, Hancock filed its complaint against certain Bank of America entities in the U.S District Court for the District of Massachusetts; on May 15, 2007, Your Honor accepted Hancock's action as a matter related to the *Parmalat* MDL proceeding.

As we represent a number of other plaintiff groups in the consolidated action, we understand that the discovery period for the other cases in the MDL proceeding has already closed. In order to expedite the discovery process in the *Hancock* action, however, we have been working closely with defendants' counsel to expedite the process. Document production by Hancock and by the defendants is nearly complete, and defendants have already noticed the depositions of three Hancock employees who were involved with plaintiffs' Parmalat-related investments. Accordingly, we request that that Court add Hancock to the Stipulated Protective Order so that we may have immediate access to the documents, transcripts and other materials produced in the consolidated proceedings.

SO ORDERED

LEWIS A. KAPLAN, USDS

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We are available to discuss this matter at Your Honor's convenience.

Sincerely,

A handwritten signature in black ink, appearing to be "Allison Chock", with a long horizontal flourish extending to the right.

Allison Chock

AC/cy

cc: All Counsel of Record (by email)